

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, et al.

Plaintiffs,

v.

Civ. No. 04-00397-GBD

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**DECLARATION OF HENNA NOVACK WALDMAN**


I, Henna Novack Waldman, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am a plaintiff in the above-captioned case.
2. I reside in Lakewood, New Jersey, with my husband, Shmuel Waldman, and our five children. I intend to attend and testify at the trial in this case.
3. Since I live in Lakewood, New Jersey (less than 40 miles from Brooklyn) transferring this case to the U.S. District Court for the Eastern District of New York in Brooklyn would be extremely convenient for me.
4. By contrast, attending trial in the District of Columbia would be extremely difficult if not impossible for me since: (i) my husband (who is also a plaintiff and also intends to attend and testify at the trial) and I have been blessed with five children under the age of eight; and (ii) my husband and I operate our own business and traveling out of the New Jersey/New York area to attend trial would cause serious harm to our business.

5. Transferring this case to D.C. would also be extremely inconvenient and expensive for me because I would have to bear the expenses involved in traveling to the D.C. area, as well as the huge costs and inconveniences of living in a hotel room and eating in a hotel or in restaurants during the course of the trial.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

April 27, 2011

  
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Henna Novack-Waldman